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Attorneys for Defendants
LIBERTY MUTUAL INSURANCE COMPANY
and LIBERTY MUTUAL GROUP INC.
(Additional Defendants' Counsel listed on next page)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ALEX CHARALAMBOUS and BRIAN
PULLEN, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

LIBERTY MUTUAL INSURANCE
COMPANY, LIBERTY MUTUAL
GROUP INC., and DOES 1 through 10,
inclusive,

Defendants.

CASE NO. 3:22-cv-00216-EMC

**ADDENDUM TO SETTLEMENT
AGREEMENT AND RELEASE OF CLASS
AND REPRESENTATIVE ACTION
CLAIMS**

Additional Defendants' Counsel

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1 Plaintiffs Alex Charalambous and Brian Pullen and Defendants Liberty Mutual
 2 Insurance Company and Liberty Mutual Group Inc. (collectively, The Parties) by and
 3 through their respective attorneys of record hereby amend their Settlement Agreement and
 4 Release of Class and Representative Action Claims (“Settlement”) as follows:

5 **ADD: 7.2.1 EMAIL NOTICE TO CLASS MEMBERS**

6 Defendants shall also provide the Settlement Administrator with the last known
 7 personal email address for any Class Members whose personal email address is readily
 8 available in Defendants’ HR information system. In addition to mailing, the Settlement
 9 Administrator shall email the Class Notice and Share Form to those Class Members whose
 10 email address has been provided.

11 **ADD: 7.3.1 OPT OUT BY EMAIL**

12 In lieu of mailing or faxing a Request for Exclusion, Class Members who want to opt
 13 out may send an email by the Response Deadline to the Settlement Administrator at an email
 14 address provided by the Settlement Administrator substantially stating the following: “I wish
 15 to be excluded from the settlement class in the case of Alex Charalambous et al. v. Liberty
 16 Mutual Insurance Company et al. I understand that by asking to be excluded from the
 17 settlement class, I will not receive any money from the class settlement of this lawsuit and
 18 will not be releasing any claims I may have.” Any such email that is not time-stamped as
 19 received by the Settlement Administrator by 11:59 p.m. on the Response Deadline will be
 20 invalid.

21 **ADD: 8.7.1 REMINDER POSTCARD**

22 Approximately sixty (60) days after mailing the Individual Settlement Amounts, the
 23 Settlement Administrator will mail a Reminder Postcard to each Class Participant who has
 24 not yet negotiated his, her, or their check. The Reminder Postcard shall inform the Class
 25 Participant (1) that a check was mailed but has not been negotiated; (2) the deadline to cash
 26 or negotiate the check; and (3) the contact information for the Settlement Administrator if the
 27 check has not been received or has been lost.

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1 The Parties' revised Notice of Proposed Class Action Settlement is attached hereto as
2 Exhibit 1.

3 Dated: February 28, 2024

CLAPP & LAUINGER LLP

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6 JAMES F. CLAPP
7 MARITA MURPHY LAUINGER
8 Attorneys for Plaintiffs
9 ALEX CHARALAMBOUS and BRIAN
10 PULLEN

9 Dated: February 28, 2024

SIDLEY AUSTIN LLP

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12 WENDY LAZERSON
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16 LIBERTY MUTUAL INSURANCE
17 COMPANY and LIBERTY MUTUAL
18 GROUP INC.
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